

Participant Statement

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268**

In the Matter of:
Ben Franklin Post Office, Ben Franklin, Texas 75415
August 19, 2011

Docket No. A2011-24

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Ben Franklin Post Office, Ben Franklin, Texas. The Final Determination was posted on July 1, 2011.
2. In accordance with applicable law, 39 U.S.C. § 404(b)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.
3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration.

Preserving a Way of Life

The residents of Ben Franklin, Texas have long been leaders in our community, our county, our state and even our nation. Even though we are small, even miniscule when compared the rest of nation, we have a quality of life that is just as important as the quality of life in one of the nation's major hubs. The recent decision by the USPS violates the democratic principles that our great country was founded on as well as the basic trust that our government will always take care of its smaller populations as well as the larger ones.

The closing of the Ben Franklin, Texas Post Office will affect not only the citizens of our community, but the surrounding communities as well. In evaluating the strengths and weaknesses of Ben Franklin, Texas, one will find that we are diverse and multi-talented. We have supply our own water through Ben Franklin Water Supply Corporation, which the people built. We also banded together to build the current Post Office building when the need arose. We have people who run ebay businesses from their homes, a catering business, a large cattle business, several large farm and ranch operations as well as several other small contractors who employ local people. We have senior citizens, school kids, retired veterans as well as disable veterans. The removal of this one little Post Office will affect every person in this area as well as show our children that history means nothing. The Ben Franklin Post Office was established in 1854, well before the Civil War. Not only is this historical site beneficial to the citizens, it is an important landmark for the entire area. The Ben Franklin Post Office as well as the Ben Franklin United Methodist Church are meeting places for information, communication and congregation of the citizens of this area.

Our entire community will suffer greatly as a result of the closing of the Ben Franklin Post Office but as far as the USPS is concerned one community's loss is a governmental agency's gain. The decision by the USPS to close the Ben Franklin Post Office should be reversed or at least suspended by The Postal Regulatory Commission (hereafter the PRC) in regard to 39 U.S.C. 404(d) because of the following reasons which will be set out below but first I'd like to express how our already economically depressed community has now become morally depressed as a result of this proposed action. We feel that we are like the tiniest of rowboats alone on the ocean in the midst of a great storm. The residents of our community also feel that our actual concerns were never considered by USPS representatives who hosted the February 23, 2011 community meeting, because this meeting was never designed to solicit our concerns nor address the needs of our community and that their information was not made available at the community meeting nor was the information correct.

Reason Number One: Services will be provided by the Roxton Post Office and available at Pecan Gap Post Office, but evidently not for long according to published list of future closings.

Delivery services and retail services will be provided by the Roxton Post Office and Pecan Gap Post Office both which are located five to six miles away. A recent list of future post offices to be closed (known as the Expanded Access Study List) in the very near future contained Enloe, Texas, Lake Creek, Texas, Pecan Gap, Texas, and Klondike, Texas. All of these facilities are located in Delta County, Texas. Enloe, Texas and Lake Creek, Texas have received their Notice of Closure as of this date. With these closings in mind, this leaves only Roxton, Texas as a close source for postal needs. What assurance does the citizens of Ben Franklin, Texas have that Roxton, Texas will remain open? If we change our addresses to receive mail at post office boxes in either Pecan Gap, Texas or Roxton, Texas will we be facing this same problem in a year or so down the road? While our numbers may be few here in Ben Franklin, our community is located on a main road going in and out of the county. Many people travel this route daily commuting back and forth to work. It would make more sense to close other facilities that are not on direct, well traveled routes than to close the Ben Franklin Post Office.

Reason Number Two: The USPS never considered the concerns or needs of the Ben Franklin community and is ignorant as to our community's traditions.

People prefer to conduct business and most other personal interaction face to face and hand to hand because they trust who and what they can see. The residents of Ben Franklin traditionally prefer to conduct business locally rather than globally. If one were to tour the highways and byways of Ben Franklin one would see vegetables growing in almost every homeowner's back yard. Growing vegetables and shopping locally is a testimony to their independence and self sufficiency. The "look 'em in the eye and give 'em a firm handshake" is part of their makeup. They support their local businesses and prefer not to travel great distances for goods and services. Why travel to a supermarket for lettuce when you can go to your own garden and harvest a head? When communicating with others, the residents of Ben Franklin prefer face to face contact and will opt to send a message by mail as opposed to using the internet. They inherently trust the mail for communication and for paying bills. Many residents in Ben Franklin still use money orders to pay their monthly financial obligations. I don't understand why the USPS thinks that it can change the traditions of the Ben Franklin residents that have existed for over a hundred fifty years by suggesting they use the internet to perform retail postal transactions. How can the USPS assume that residents of Ben Franklin who have been used to conducting retail postal transactions in their own neighborhood to suddenly alter their life style to include traveling 5 to 6 miles away from their homes? The fact that the USPS ignores the obstacles that our citizens will have to overcome is indicative of the callous disdain that the USPS has exhibited toward our community since the inception of this proposed closure of the Ben Franklin Post Office. The USPS assumes that Ben Franklin resident can visit the Roxton Post Office while completing his/her normal daily errands. This assumption again demonstrates the ignorance of the USPS with regard to Ben Franklin, Texas. If the USPS had really assessed our community they would have ascertained that Ben Franklin residents don't conduct daily errands in the Roxton, Texas area. On a daily basis our citizens travel to the Ben Franklin Post

Office to not only obtain their mail and do their postal business but to acquire the latest information on current events as well as global situations. The post office is a central point in our community for both gathering and sending out information. With this office closed as well as the upcoming closures, how close will the next facility be? Since our citizens our older most of them do not use or even have access to the internet. The USPS has determined that postal services can be obtained via the internet. This is great if you are a computer savy person. Most people in Ben Franklin are not. Also it has be stated that the rural delivery person will have the ability to provide most of the services now available at the post office window. Since our citizens are mostly older, is it feasible for our little old people to be chasing down the rural delivery person for stamps, etc... when they could have the ease of making their purchases at the post office?

Reason Number Three: The USPS and its representative Allison Rizan failed to answer many of the question of the residents of Ben Franklin and provide correct information concerning Ben Franklin as a community at the February 13, 2011 meeting and the USPS has not fully disclosed upcoming closings that will also affect our citizens.

The USPS hosted a community meeting on February 13, 2011 at Chapel in Ben Franklin, Texas. The flyer/notice that the USPS posted at the Ben Franklin Post Office indicated that this meeting would be a forum where the USPS would listen to comments and concerns from the community regarding its consideration to close the Ben Franklin Post Office. We were told that retail services would be available 5 to 6 miles away. In light of the current closing lists, where will retail services be available? Will the Roxton Post Office also receive its Notice of Closure at some point in the near future. We, the people, who live in rural areas are not second class citizens. We have the right to expect postal services as much as any citizen in an urban area. Closings of other post offices was not disclosed. If people had known that Pecan Gap was next on the list their responses would have been vastly different. Ms. Rizan could not answer any questions about how work load figures were established or created. She could not answer any questions about how salary or benefit standards were met. Her standard answer was "I do not have this information." Again and again she made this statement. Finally, one gentleman asked her exactly what she did know only to have her remain silent at that point. At such a meeting, one would assume that all information would be researched and available for such an important decision. On the fact sheet for Post Office Closing or Consolidation Proposal, under school, churches and organization in Service Area and Businesses in Service Area, the Ben Franklin Water Supply Corporation is listed as Ben Franklin Supply Water Closet. This is our local water system. We supply all water consumed by citizens in this area. We are community owned and operated. (Just another example of the determination of the citizens of Ben Franklin.) When something as important and viable as our mail service is at stake, one would think the major water supplier would be listed as more than a closet. While there are no school in Ben Franklin, there are three churches, along with the church organizations for teenagers, actually here in Ben Franklin, not Pecan Gap as listed. There is a catering business located in Ben Franklin, Texas.

Reason Number Four: The reason to discontinue is listed as unit is vacant is not the fault of the citizens of Ben Franklin, Texas. The problem of the vacant unit is not valid since we have had a physical body in our post office continually. If the post office can supply us with temporary personnel why can they not provide us with permanent personnel. Vacant implies that no one is available and yet someone is there on a daily basis. As for the workload, Ms. Rizan was asked repeatedly what workload would we need to keep Ben Franklin Post Office open and she stated she did not know. That very question has never been answered. Neither has the question of how much money does Ben Franklin Post Office need to make to remain open been answered.

Federal law prohibits the closing of post offices because they are not making money yet this is the very reason listed as reason for closure of Ben Franklin. Rural post offices are the backbone of rural America and are an integral part of the social, political, and economic fabric of small towns. They are the glue that holds the

nation's rural communities together. If a rural post office disappears, the town often disappears. Rural customers are not second-class citizens; they deserve access to the postal services that citizens in big cities enjoy. Rural America contains 80 percent of the nation's land and is home to roughly 56 million people. Rural Americans are 26 percent of the population and make up 34 percent of Americans with incomes below the official poverty line. Small towns also have the highest concentrations of elderly people. Rural post offices often serve as a gathering point for retirees and act as a source of information that goes beyond postal issues. Rural post offices fulfill a need for this segment of the population that goes beyond postal services. An attack on rural post offices is an attack on rural America. Because the smallest 10,000 post offices cost the Postal Service less than one percent of its budget to operate, this is not a money issue. That is, *even if every rural post office in every single rural community* in America were closed, the Postal Service would save very little money. Therefore, we feel the USPS overstates the economic savings that will be realized by the USPS. Moreover, if post office boxes were not available in rural areas, the cost of paying a rural carrier to deliver the mail to their residences would be much more expensive. Small post offices play a critical role in rural America. Their cost to the Postal Service is minuscule. They are a valuable asset that should not be harmed. Indeed, we should be looking at ways rural post offices can better assist government at all levels, local, state and federal.

In contemplation of the Notice of Closure and the Fact Sheet as provided to the citizens of Ben Franklin, Texas, we feel the Postal Service did not observe proper procedure as required by law. Specifically, the Postal Service did not inform customers of their right to appeal, made reliable information available for inspection, consider the effects of closure on the community or include required findings when notifying customers of the closing. We respectfully request that the Commission review all documents and exhibits submitted to this body and request this Commission to order that the entire matter be returned for further consideration.

Respectfully,
Benny and Julie Lovell
Concerned Citizens of Ben Franklin, Texas
August 19, 2011

Exhibit “A”

Post Office™ Location - BEN FRANKLIN

828 FARM ROAD 38
BEN FRANKLIN, TX 75415-9998
(800) ASK-USPS
(800) 275-8777
(903) 325-4333
Fax: (903) 325-4333

TTY Service
(877) 889-2457
for hearing impaired

Business Hours

Mon-Fri
8:00am-12:00pm
1:00pm-4:00pm
Sat-Sun
Closed

Last Daily Collection

Mon-Thu
4:30pm
Fri
4:30am
Sat
4:30pm
Sun

Seasonal Last Collection Hours

Mon-Sun